

APPENDIX D

ENGINEERED BARRIERS AND POST-REMEDATION ACTIVITIES

PURPOSE OF THIS APPENDIX

The purpose of this appendix is to provide additional detail on engineered barriers installed during Phase 1 of the proposed decommissioning and describe the post-remediation monitoring, maintenance, and institutional control program to be implemented for the WVDP premises following Phase 1 of the Proposed Decommissioning.

INFORMATION IN THIS APPENDIX

This appendix includes information on engineered barrier conceptual designs and the post-remediation monitoring, maintenance, and institutional control program, organized as follows:

- Section 1 describes the conceptual designs of the engineered barriers to be installed during Phase 1 proposed decommissioning;
- Section 2 describes the post-remediation site monitoring and maintenance program that would be implemented for the project premises at the conclusion of Phase 1 proposed decommissioning;
- Section 3 describes the post-remediation site institutional control program that would be implemented for the project premises at the conclusion of Phase 1 of the proposed decommissioning.

RELATIONSHIP TO OTHER PLAN SECTIONS

Information provided in Section 1 on the project background and Section 7 on proposed decommissioning activities, would help place the information in this appendix into context. The content of Appendix D, like that of other parts of the plan, is consistent with the annotated NRC decommissioning plan checklist in Appendix A, which expresses NRC's expectations for section content.

1.0 Description of Engineered Barriers

This section presents a detailed description of the conceptual designs for the engineered barriers to be installed during Phase 1 of the proposed decommissioning, supplementing the physical descriptions previously presented in Section 7. Engineered barriers would be installed at the WMA 1 and WMA 2 excavations to facilitate the removal of sub-grade structures, excavate contaminated soil to meet unrestricted release criteria, and to prevent the recontamination of the WMA 1 and WMA 2 excavated areas by the non-source area of the North Plateau Plume.

According to the NRC's Final Policy Statement (67 FR 22), engineered barriers are generally passive manmade structures or devices intended to improve a facility's ability to meet a site's performance objectives. While institutional controls are designed to restrict access, engineered barriers are usually designed to inhibit water from contacting waste, limit releases, or mitigate doses to intruders.

1.1 Waste Management Area 1

Phase 1 of the WVDP proposed decommissioning would include the removal of all above grade and sub-grade structures of WMA 1 and the removal of the underlying soils associated with the source area of the north plateau groundwater plume to a maximum depth of approximately 50 feet. The removal of the sub-grade structures and the soils of the source area of the plume would require the installation of temporary and permanent subsurface hydraulic barrier walls prior to excavation as described in Section 7. A French drain system would be installed in the backfilled excavation to prevent mounding of groundwater against the permanent barrier wall as described in Section 7. These barrier walls and the French drain system are described in greater detail below.

1.1.1 Need for Subsurface Engineered Barriers and French Drain

During Phase 1 proposed decommissioning sub-grade structures (building cells, underground piping and tanks) and underlying vadose and saturated soils associated with the source area of the North Plateau Plume in WMA 1 would be removed down to the underlying Lavery till to meet the unrestricted release criteria in 10 CFR 20.1402. Much of the WMA 1 excavation would be within the saturated sand and gravel unit within the north plateau groundwater plume.

Subsurface hydraulic barrier walls would be installed on each side of the WMA 1 excavation to:

- Isolate the excavation from the non-source area of the north plateau groundwater plume,
- Prevent groundwater intrusion into the excavation from the surrounding sand and gravel unit,
- Allow dewatering of saturated soils within the excavation,
- Facilitate removal of sub-grade structures,
- Allow excavation of subsurface soil down into the Lavery till and up to the hydraulic barrier walls,
- Allow final status surveys and NRC confirmatory surveys to be performed in the bottom and sides of the excavation, and
- Prevent recontamination of the remediated and backfilled WMA 1 excavation from the non-source area of the north plateau groundwater plume until a Phase 2 decommissioning decision is made.¹

Subsurface soil characterization would be performed in WMA 1 before excavation begins to identify the lateral extent of subsurface soil contamination associated with the source area of the North Plateau Plume. This subsurface soil data would be used to locate the temporary interlocking sheet piling which would be driven through the uncontaminated sand and gravel unit into the underlying Lavery till on the upgradient and cross-gradient sides of the WMA 1 excavation to prevent groundwater intrusion into the excavation from upgradient sources. A

¹The recontamination potential is low since groundwater flows northeast away from WMA 1.

permanent hydraulic barrier of slurry wall type construction would be installed on the downgradient side of the excavation in soil contaminated by the north plateau groundwater plume to act as an intrusion barrier to prevent the migration of Sr-90 contaminated groundwater from the non-source area of the north plateau groundwater plume into the WMA 1 excavation.

The permanent downgradient hydraulic barrier would:

- Prevent recontamination of the remediated and backfilled WMA 1 excavation from the non-source area of the plume until a Phase 2 decommissioning decision is made, and
- Minimize groundwater recharge to the non-source area of the plume, thereby minimizing hydraulic heads and groundwater velocity.

A French drain system would be installed adjacent and hydraulically upgradient of the permanent hydraulic barrier wall once the WMA 1 excavation has been backfilled to maintain groundwater elevations near their current levels. The French drain system would:

- Prevent groundwater mounding against, and potential overtopping of, the permanent downgradient hydraulic barrier wall;
- Maintain hydraulic heads on the upgradient side of the barrier wall that coincide with the elevation of the French drain system, that are higher than groundwater levels downgradient of the barrier wall. This would create a hydraulic gradient towards the non-source area of the north plateau groundwater plume, preventing seepage from the plume through the wall into the backfilled excavation; and
- In conjunction with the permanent downgradient hydraulic barrier, minimize groundwater recharge to the non-source area of the North Plateau Plume thereby minimizing hydraulic heads and groundwater velocity across the North Plateau.

1.1.2 Hydraulic Barrier Walls and French Drain System

The WMA 1 excavation would require the installation of approximately 2,250 linear feet of subsurface hydraulic barrier wall comprised of temporary interlocking steel sheet piling on the upgradient and cross-gradient sides of the excavation and a permanent hydraulic barrier wall on the downgradient side of the excavation before excavation begins as shown on Figure D-1.

Temporary Sheet Pile Barrier Walls

Approximately 1,500 feet of conventional interlocking sheet piles would be installed in uncontaminated soils along the upgradient and cross-gradient sides of the excavation boundary before excavation begins (Figure D-1). The piles would be driven a minimum of two feet into the underlying Lavery till to prevent groundwater from migrating beneath the piles into the WMA 1 excavation.

Contaminated soil exceeding the subsurface soil cleanup criteria specified in Section 5 would be excavated leaving a soil cut-back slope against the sheet pile walls containing soil with radionuclide concentrations below the subsurface soil clean-up criteria.² The soil cut-backs along the sheet pile walls would be surveyed during the Phase 1 final status surveys as specified in Sections 7 and 9 of this plan. The sheet pile barrier wall would be removed as

² Figure 7-8 in Section 7 of this plan shows typical excavation slopes.

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specified in Section 7 once the final status survey, the independent verification survey, and backfilling of the WMA 1 excavation is completed to allow a return to typical groundwater flow patterns within the sand and gravel unit.

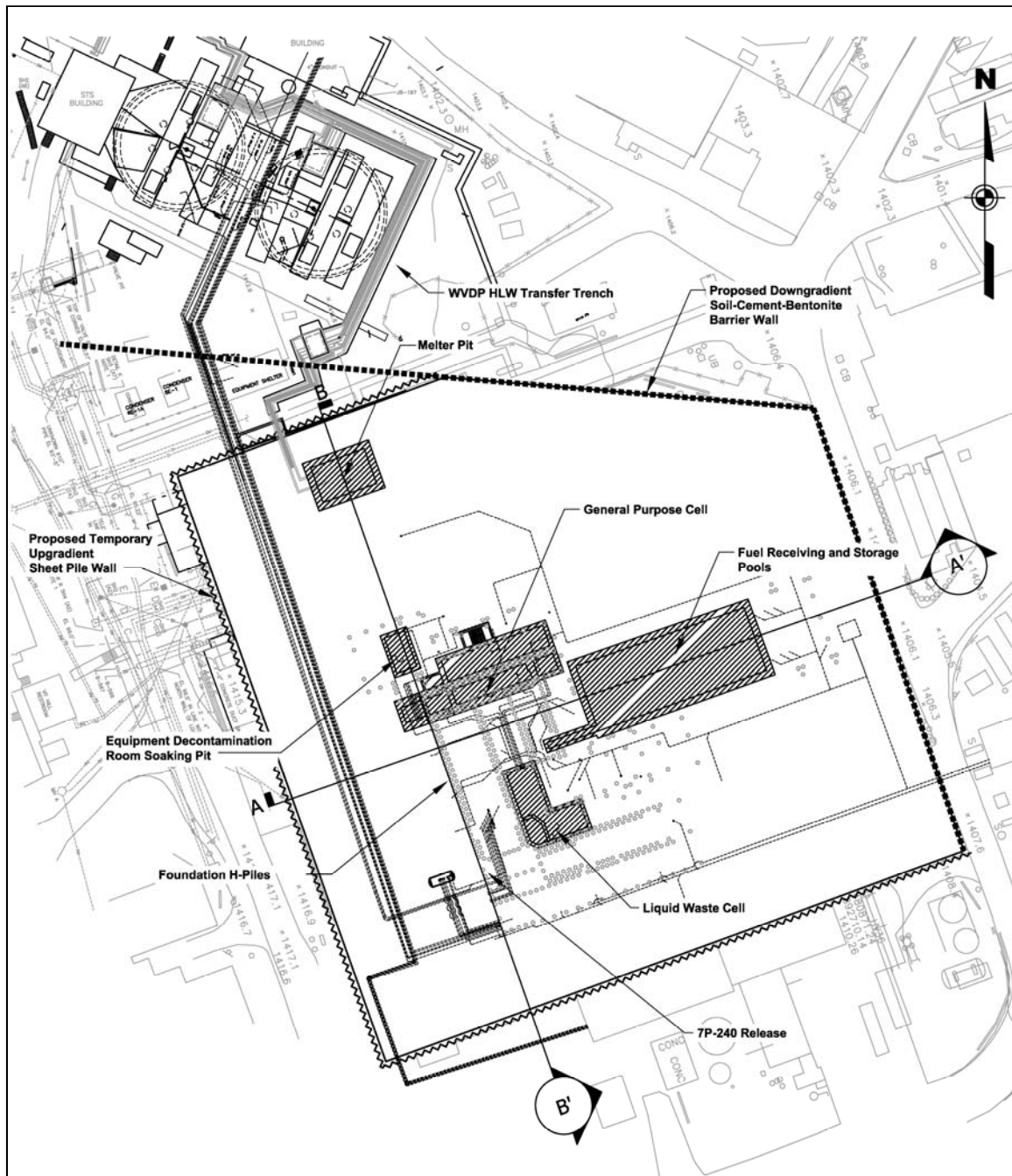


Figure D-1. Plan View of the WMA 1 Excavation

Permanent Downgradient Hydraulic Barrier Wall

The permanent hydraulic barrier wall constructed on the downgradient side of the WMA 1 excavation (Figure D-1) would be a vertical soil-cement-bentonite slurry wall installed using slurry wall trenching technology. This hydraulic barrier technology was selected because of its long history of successful usage. This wall would prevent migration of Sr-90 contaminated groundwater from the non-source area of the North Plateau Plume into the WMA 1 excavation both during excavation and after backfilling the excavation with clean fill.

The hydraulic barrier wall downgradient of the WMA 1 excavation would be installed under a carefully planned and rigorous quality control-quality assurance program as described in Section 8.

The soil-cement-bentonite barrier wall would be a mixture of 85 percent soil, five percent Portland cement, and 10 percent bentonite. The Portland cement would provide internal stability to the barrier wall and it would have an initial maximum design hydraulic conductivity of $6.0 \text{ E-}06 \text{ cm/s}$.

The soil-cement-bentonite barrier wall would be approximately 750 feet long, two to 13 feet wide, and would be up to 50 feet deep with an average depth of 27 feet. The wall would extend through the sand and gravel unit and a minimum of two feet into the Lavery till to minimize groundwater flow beneath the bottom of the wall.

Approximately 225 feet of barrier wall outside of the excavation boundary would be two to three feet thick. The remaining 525 feet of barrier wall within the boundary of the excavation would be at least 13 feet thick to allow the excavation of subsurface soils up to and into the barrier wall. The proposed thickness would allow an excavation cut back slope of 1:2 (horizontal to vertical), which is typical of what can be achieved in most stiff clayey soils. The barrier wall material within the excavation cut-back slope would be surveyed during the Phase 1 final status survey.³

The upper three feet of the barrier wall would be constructed of clean backfill similar to the surrounding sand and gravel unit. This material would allow vehicular traffic over the barrier wall without damaging the underlying barrier wall.

French Drain System

A French drain system would be installed upgradient of the permanent hydraulic barrier wall during the backfilling of the WMA 1 excavation (Figure D-1). The French drain would be installed to keep groundwater levels at their current level on the upgradient side of the barrier wall to prevent groundwater mounding against the wall, prevent potential overtopping of the wall, and promote groundwater flow towards the non-source area of the north plateau groundwater plume.

The French drain would be constructed by excavating a trench, approximately four feet wide and 10 feet deep, placing perforated pipe into the bottom of the trench, and backfilling the trench with permeable granular materials. The northwest and southeast portions of the French

³ As explained in Section 7 of this plan, any soil found to exceed cleanup goals would be removed only within the confines of the planned excavation, that is, within the confines of the downgradient hydraulic barrier wall and the sheet piles.

drain would meet at a concrete manhole located near the mid-point of the barrier wall. The French drain would be sloped to the southeast to discharge by gravity flow to a surface water drainage discharging to Erdman Brook.

1.1.3 Durability of Engineered Barriers

The materials used in the construction of the soil-cement-bentonite slurry walls are common natural geologic construction materials that exhibit long-term durability within the natural environment. The engineered barriers are expected to retain their design effectiveness until the start of Phase 2 of the decommissioning at a minimum. Their continued use would be among the factors evaluated in determining the approach to Phase 2 of the decommissioning.

The low-permeability bentonite used in the slurry wall construction is a natural geologic material exhibiting demonstrated long-term mineralogical and geologic stability (references D-2 and D-3). Chemical contaminants that might degrade the physical characteristics and/or compromise the hydraulic conductivity of soil-bentonite slurry walls include:

- Concentrated solutions of organic fluids (Mille, et al. 1992 and Khera and Tirumala 1992),
- Organic groundwater contaminants (Evans, et al. 1985b and Grube 1992), and
- Acidic or highly alkaline solutions (Evans, et al. 1985a and Fang et al. 1992).

However, these conditions are not present within the project premises.

The backfill to be used for slurry wall construction would be a mixture of soil and commercial sodium bentonite. The soil can be any material that could be classified as CL, CL/ML or ML/CL by the Unified Soil Classification System. The soil backfill would be natural geologic materials similar to the sand and gravel unit in the North Plateau. Uncontaminated sand and gravel from the trench excavation may also be used as soil backfill for the slurry wall. The sodium bentonite would be added at a rate recommended by the vendor to achieve a hydraulic conductivity on the order of 1 E-08 to 1 E-06 cm/s.

The geotechnical stability of the soil-bentonite slurry wall has been evaluated under combined static and seismic loading conditions. The evaluation results indicate that the proposed soil-bentonite slurry wall would provide the necessary strength to withstand damage from static and seismic loads predicted to occur during a hypothetical earthquake generating a horizontal acceleration of 0.20 g in the soil, with an approximate factor of safety of greater than 1.3 to greater than 3.0 (URS 2000).

The French drain would be constructed of natural (stone backfill) and man-made (perforated drain pipe, geotextile) materials. The French drain trench backfill would be designed to minimize silting of the drainpipe. The French drain would be periodically monitored and maintained until the start of Phase 2 decommissioning to ensure it is functioning properly.

1.1.4 Engineered Barriers and Groundwater Flow

Groundwater flow in the sand and gravel unit is currently to the northeast across the north plateau through WMA 1 and parallel to WMA 2 (Figure D-2). The permanent hydraulic barrier wall and French drain installed on the downgradient side of the WMA 1 excavation are nearly perpendicular to the current groundwater flow path in the sand and gravel unit in the north

plateau.

A three-dimensional near-field groundwater model was developed to simulate groundwater flow conditions near the engineered barriers installed at WMA 1 and WMA 2 using the STOMP computer code (Nichols, et al. 1997)⁴. The permanent barrier wall downgradient of the Process Building is oriented parallel to the groundwater elevation contours and perpendicular to groundwater flow in Figure D-2. The segment of barrier wall between the Process Building and the Waste Tank Farm has been modeled parallel to groundwater flow due to the model constraints.

Groundwater modeling suggests groundwater flow patterns upgradient of the barrier wall and French drain are similar to current flow patterns in the sand and gravel unit (Figure D-2). However, the hydraulic gradient becomes steeper at the barrier wall reflecting the effect of this barrier on groundwater flow. Water table elevations are approximately 15 feet higher on the upgradient side of the barrier wall compared to water levels immediately downgradient of the wall. This steep hydraulic gradient suggests that groundwater would preferentially flow from the backfilled WMA 1 excavation across the barrier wall into the non-source area of the North Plateau Plume, rather than from the non-source area of the plume into the backfilled WMA 1 excavation. Higher groundwater elevations are also found on the upgradient side of the barrier wall separating the WMA 1 excavation from the Waste Tank Farm, suggesting potential flow from WMA 1 into the Waste Tank Farm area. Flow contours east of the barrier wall suggest that groundwater flows to the east into the area of the backfilled WMA 2 excavation, as discussed in Section 1.2.4 of this appendix.

Modeling suggests that groundwater flow in the sand and gravel unit downgradient of the permanent barrier wall in WMA 1 continues to the northeast across the North Plateau. However, the upgradient diversion of groundwater flow by the barrier wall system results in an overall reduction in the hydraulic gradient of the non-source area of the north plateau groundwater plume.

⁴ STOMP (Subsurface Transport Over Multiple Phases) solves the relevant conservation equations for the flow of both liquid and gas (air with water vapor) phases in a porous matrix confined in a cylindrical shape. This computer code was developed by DOE's Pacific Northwest National Laboratory.

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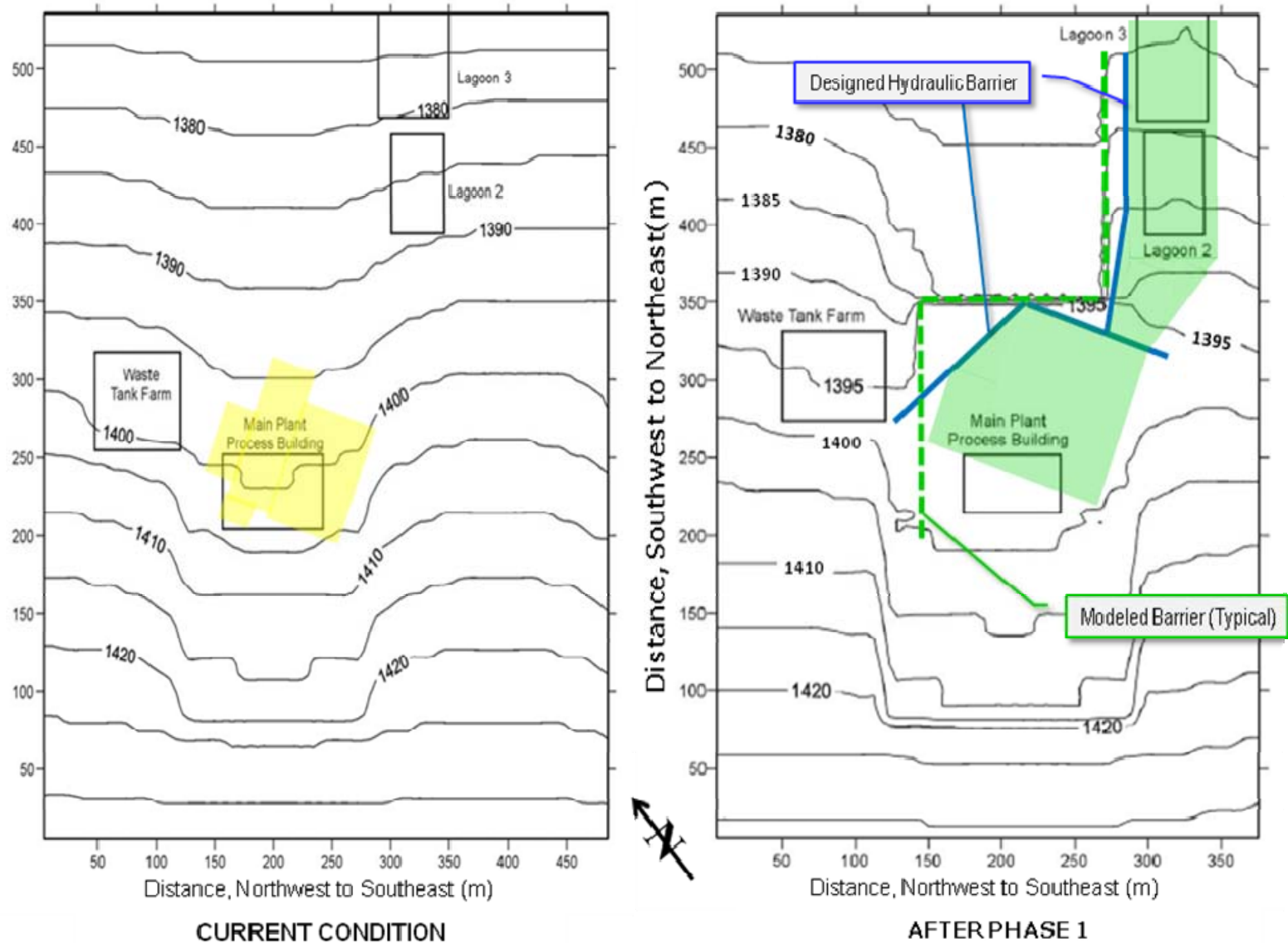


Figure D-2. Groundwater Flow Associated with the WMA 1 and WMA 2 Engineered Barriers

1.2 Waste Management Area 2

The Phase 1 proposed decommissioning activities in WMA 2 would include the removal of Lagoons 1 through 3, the Neutralization Pit, Interceptors, Solvent Dike, and surrounding contaminated soils within a single excavation down into the underlying Lavery till. Most of this excavation is cross gradient to the non-source area of the North Plateau Plume (Figure D-3). The removal of the lagoons, sub-grade structures, and surrounding soils would require the installation of a permanent subsurface hydraulic barrier wall prior to excavation to facilitate removal activities and to prevent potential recontamination of the area from the non-source area of the north plateau groundwater plume as described in Section 7. The barrier wall for WMA 2 is described in greater detail below.

1.2.1 Need for Subsurface Engineered Barriers

Lagoons 1 through 3, sub-grade structures, and surrounding contaminated vadose and saturated soils would be removed to a depth of approximately 14 feet to meet the unrestricted release criteria in 10 CFR 20.1402. Most of the WMA 2 excavation may be impacted by migration of Sr-90 contaminated groundwater from the adjacent non-source area of the north plateau groundwater plume. The need for a subsurface hydraulic barrier wall for the 4.2-acre excavation area across WMA 2 is the same as the rationale described earlier in Section 1.1.1 of this Appendix for the excavation of WMA 1.

A permanent hydraulic barrier of slurry wall type construction would be installed on the northwest side of the WMA 2 excavation to act as an intrusion barrier to prevent the migration of Sr-90 contaminated groundwater from the non-source area of the north plateau groundwater plume into the WMA 2 excavation. This permanent downgradient hydraulic barrier would prevent recontamination of the remediated and backfilled WMA 2 excavation from the non-source area of the north plateau plume until a Phase 2 decommissioning decision is made.

1.2.2 Hydraulic Barrier Wall

Before excavation activities begin in WMA 2 a permanent subsurface hydraulic barrier wall would be installed on the northwest side of the WMA 2 excavation as shown on Figure D-3.

Permanent Hydraulic Barrier Wall

The permanent hydraulic barrier wall constructed on the northwest side of the WMA 2 excavation would be a vertical soil-bentonite slurry wall installed using slurry wall trenching technology. This hydraulic barrier technology was selected because of its long history of successful usage. This wall would prevent migration of Sr-90 contaminated groundwater from the non-source area of the North Plateau Plume into the WMA 2 excavation both during excavation and after the excavation has been backfilled with clean fill.

The hydraulic barrier wall installed northwest of the WMA 2 excavation would be installed under a carefully planned and rigorous quality control-quality assurance program as described in Section 8. It would be a mixture of 90 percent soil and 10 percent bentonite and it would have an initial design hydraulic conductivity of 1.0 E-7 cm/s . The barrier wall would be approximately 1,100 feet long, sufficiently wide to provide the stability necessary to permit excavation close to the edge of the excavation, and up to 20 feet deep, with an average depth of 16 feet. The wall would extend through the sand and gravel unit and a minimum of two feet into the Lavery till to minimize groundwater flow beneath the bottom of the wall.

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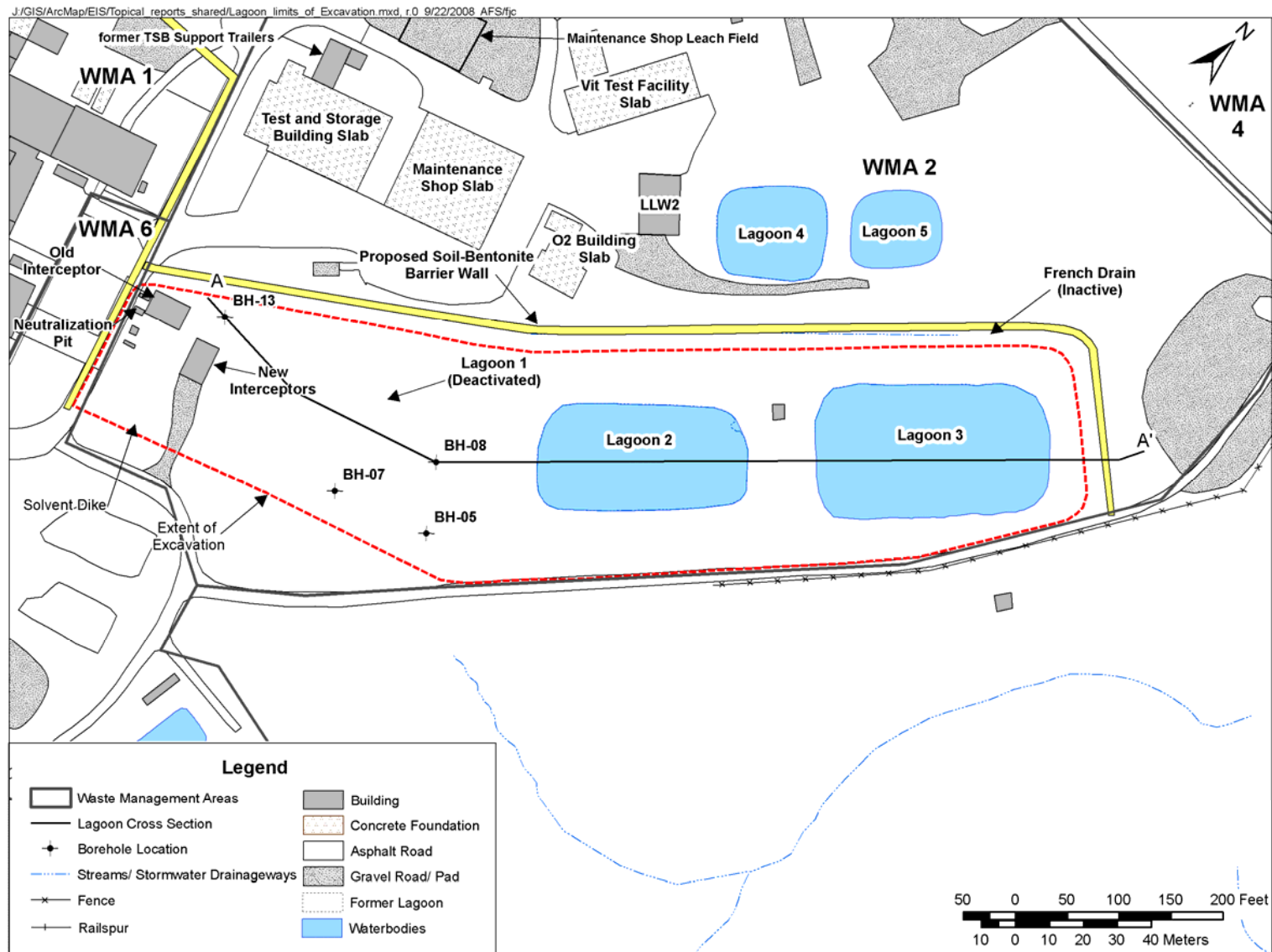


Figure D-3. Plan View of the WMA 2 Excavation

The upper three feet of the barrier wall would be constructed of clean backfill similar to the surrounding sand and gravel unit. This material would allow vehicular traffic over the barrier wall without damaging the underlying barrier wall.

1.2.3 Durability of Engineered Barriers

Refer to Section 1.1.3 of this Appendix for a discussion on the assumed durability of the soil-bentonite slurry wall installed at WMA 2.

1.2.4 Engineered Barriers and Groundwater Flow

Groundwater flow in the sand and gravel unit is currently to the northeast across the north plateau through WMA 1 and parallel to WMA 2 (Figure D-2). The permanent hydraulic barrier wall installed on the northwest side of the WMA 2 excavation nearly parallels the current groundwater flow path in the sand and gravel unit in the north plateau.

Groundwater modeling suggests groundwater flow patterns in the non-source area of the north plateau groundwater plume north of the WMA 2 barrier wall are similar to current flow patterns in the sand and gravel unit (Figure D-2). However, the overall hydraulic gradient of the non-source area of the north plateau plume is shallower than the current gradient due to the reduction of groundwater flow contribution attributed to the WMA 1 barrier wall system.

Groundwater modeling suggests the potential for higher groundwater levels within the backfilled WMA 2 excavation and the potential for groundwater flow from the excavation towards Erdman Brook and across the WMA 2 barrier wall towards the non-source area of the North Plateau Plume. The modeled groundwater levels in the backfilled WMA 2 excavation reflect contributions of groundwater flow from the WMA 1 excavation around the southeast end of the WMA 1 barrier wall.

2.0 Post-Remediation Site Monitoring and Maintenance

This section describes the post-remediation site monitoring and maintenance program to be implemented by the DOE at the project premises following the completion of Phase 1 of the proposed decommissioning. The program would include monitoring and maintenance associated with engineered barriers installed within the project premises and monitoring of environmental media within and outside the project premises. This monitoring and maintenance program would continue until the start of Phase 2 of the decommissioning, when the program requirements would be re-evaluated. DOE concludes that this program would be adequate to control and maintain the project premises because it is similar to the successful program currently in use and because it appropriately addresses all facilities of importance.

2.1 Monitoring and Maintenance of Engineered Barriers and Systems

The performance of the engineered barriers installed at WMA 1 and WMA 2 during Phase 1 proposed decommissioning would be routinely monitored up to the start of Phase 2 of the decommissioning to ensure they function as designed. Systems and engineered barriers installed during work leading to the interim end state, such the Tank and Vault Drying System at WMA 3 and the geomembrane cover and slurry wall at WMA 7, would also be routinely monitored and maintained as part of the DOE monitoring and maintenance program. Corrective actions would be implemented to correct any observed defects or irregularities with these engineered barrier and systems.

2.1.1 North Plateau Subsurface Barrier Walls and French Drain

The monitoring and maintenance program would monitor the performance and condition of the subsurface hydraulic barriers installed at WMA 1 and WMA 2, and the French drain at WMA 1. This program would include routine inspections of these systems for signs of degradation or loss of performance.

Hydraulic Barrier Walls

Piezometers would be installed upgradient and downgradient of the permanent hydraulic barrier walls installed downgradient of the WMA 1 and northwest of the WMA 2 excavations (Figure D-4). These piezometers would be spaced at intervals at least equal to the maximum lateral spacing recommended by the U.S. Environmental Protection Agency (EPA 1998). Water levels in these piezometers would be routinely monitored to evaluate the performance of these hydraulic barriers. Groundwater would be sampled and analyzed semi-annually for the radiological indicator parameters (gross alpha, gross beta, tritium) and for Sr-90 to evaluate the effectiveness of the barrier walls in preventing recontamination of WMA 1 and WMA 2.

If groundwater monitoring suggests repairs to the walls are required, these repairs would be accomplished through grouting, consistent with past industry experience and practice (e.g., EPA 1998).

French Drain

Monitoring and maintenance activities associated with the French drain installed upgradient of the WMA 1 hydraulic barrier wall would include monitoring of groundwater levels in piezometers installed on the upgradient and downgradient sides of the French drain following installation.

The need for and extent of repairs to the French drain, if any, would be determined based on analysis of the groundwater level data, which would be evaluated to identify evidence for any localized defect(s) in the French drain.

2.1.2 Waste Tank Farm Tank and Vault Drying System

The Tank and Vault Drying System installed in WMA 3 during the work to establish the interim end state would be routinely monitored and maintained during the Phase 1 period to ensure its continued operation as designed. The major components of the system – such as the blowers, heaters, and dehumidifier units – would be inspected and repaired or replaced as necessary to ensure continued operation of the system.

2.1.3 Waste Tank Farm Dewatering Well

As specified in Section 7 of this plan, the existing dewatering well would continue to be used to artificially lower the water table to minimize in-leakage of groundwater into the tank vaults. The water from this well would be collected, sampled, treated if necessary using a portable wastewater treatment system, and released to Erdman Brook through a State Pollutant Discharge Elimination System-permitted outfall.

2.1.4 NRC-licensed Disposal Area Engineered Barriers

The geomembrane cover and the hydraulic barrier wall installed at the NDA during work to establish the interim end state would be routinely monitored and maintained throughout Phase

Geomembrane Cover

The geomembrane cover would be routinely inspected for signs of deterioration or damage to the membrane. The seams connecting the geomembrane panels would be inspected to evaluate their condition. The geomembrane cover would be repaired to remedy any defects or irregularities identified during these inspections.

Hydraulic Barrier Wall

A monitoring and maintenance program similar to that described for the barrier walls installed at WMA 1 and WMA 2 would be implemented for the hydraulic barrier wall installed upgradient of the NDA. Twenty-one piezometers were installed upgradient and downgradient of the barrier wall during its construction. Water levels in these piezometers would be routinely monitored during Phase 1 to evaluate the performance of the barrier wall in limiting groundwater flow into the NDA.

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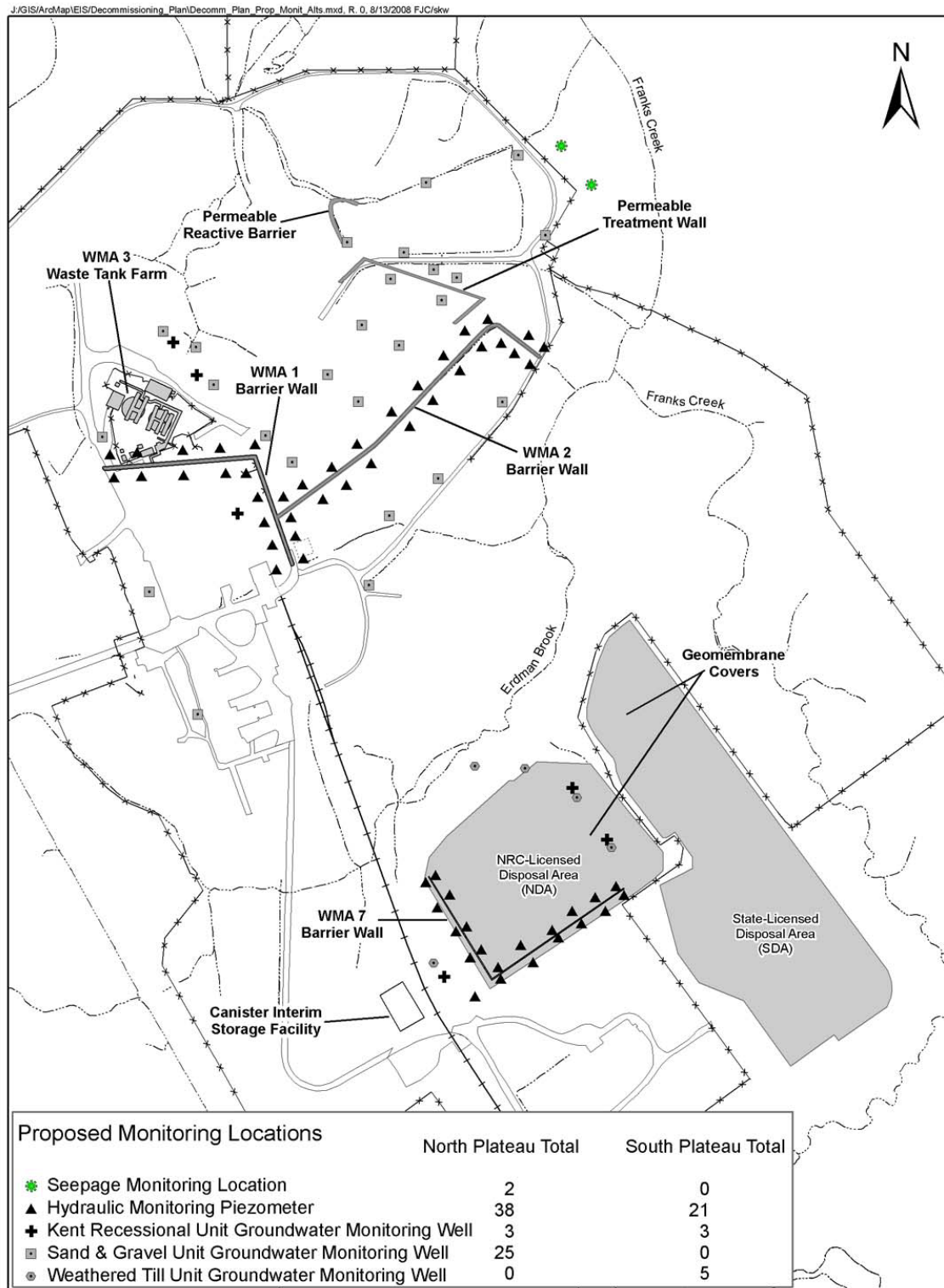


Figure D-4. Groundwater Monitoring Locations within the Project Premises during the Phase 1 Institutional Control Period

2.1.5 Security Features

The features important to security on the project premises and to security of the new Canister Interim Storage Facility during the period before Phase 2 of the decommissioning would be periodically inspected and maintained in good repair. These features include the security fences, signs, and security lighting described in Section 3.2 of this appendix.

2.2 Environmental Monitoring

The Phase 1 proposed decommissioning activities would include the removal of the following facilities:

- Above-ground and below-grade facilities in WMA 1 and the underlying source area of the north plateau groundwater plume within a single excavation down into the underlying Lavery till;
- Lagoons 1, 2, and 3, the Neutralization Pit, Interceptors, Solvent Dike, and surrounding contaminated soils in WMA 2 within a single excavation down into the underlying Lavery till; and
- Most remaining facilities and concrete slabs down to a maximum depth of two feet.

The following facilities and contamination areas within the project premises would not be considered during Phase 1 of the proposed decommissioning but would be addressed during Phase 2:

- The Waste Tank Farm in WMA 3, including the Permanent Ventilation System Building and the Supernatant Treatment System Support Building;
- The Construction Demolition Debris Landfill in WMA 4;
- The NDA in WMA 7; and
- The non-source area of the north plateau groundwater plume.

The DOE would implement an environmental monitoring program to monitor closed and remaining facilities and the non-source area of the north plateau groundwater plume as part of its management of the project premises during the Phase 1 institutional control period. Environmental monitoring would include onsite groundwater, storm water, and air monitoring, and both onsite and offsite surface water, sediment, and radiation monitoring as described below. Annual reports would be issued summarizing the monitoring results. These reports would include analyses of the data collected, along with conclusions about trends and compliance with regulatory limits.

2.2.1 Groundwater Monitoring Within the Project Premises

Groundwater within the project premises would be monitored during the Phase 1 institutional control period in accordance with the DOE WVDP Groundwater Monitoring Plan in effect at the time. Offsite groundwater monitoring would not be performed as this monitoring program was discontinued in 2007. The onsite groundwater monitoring program for the project premises is described below and shown on Figure D-4. A total of 36 groundwater wells would be routinely monitored along with 59 piezometers.

WMA 1 - Process Building and Vitrification Facility Area

Groundwater in the sand and gravel unit in the backfilled WMA 1 excavation would be

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monitored using the network of piezometers installed to monitor the effectiveness of the hydraulic barrier wall and French drain described in Section 2.1.1 of this Appendix. A monitoring well screened in the sand and gravel unit would also be installed in the upgradient portion of the WMA 1 excavation to provide information on groundwater quality flowing into the backfilled excavation.

An additional monitoring well screened in the Kent Recessional Sequence would be installed immediately upgradient of the WMA 1 hydraulic barrier wall to monitor groundwater in this unit and to evaluate potential migration of groundwater from the source area of the north plateau groundwater plume that was removed during Phase 1 of the proposed decommissioning.

Groundwater from these piezometers and monitoring wells would be sampled semiannually for radiological indicator parameters (gross alpha, gross beta, and tritium) and for Sr-90 during the Phase 1 institutional control period.

WMA 2 - Low-Level Waste Treatment Facility Area

Groundwater in the sand and gravel unit in the backfilled WMA 2 excavation would be monitored using the network of piezometers installed to monitor the effectiveness of the hydraulic barrier wall and French drain described in Section 2.1.1 of this Appendix. Three monitoring wells screened in the sand and gravel unit would also be installed on the southeastern boundary of the WMA 2 excavation to provide information on groundwater flow and quality in this area.

Groundwater from these piezometers and monitoring wells would be sampled semiannually for radiological indicator parameters (gross alpha, gross beta, and tritium) and for Sr-90 during the Phase 1 institutional control period.

WMA 3 - Waste Tank Farm Area

Groundwater in the sand and gravel unit and the Kent Recessional Sequence would be routinely monitored at WMA 3 during the Phase 1 institutional control period. Four wells would be screened in the sand and gravel unit with one well upgradient and three wells downgradient of the Waste Tank Farm. Two wells screened in the Kent Recessional Sequence would be installed downgradient of the Waste Tank Farm.

Groundwater from these wells would be sampled semiannually for radiological indicator parameters (gross alpha, gross beta, and tritium) and for Sr-90 during the Phase 1 institutional control period.

WMA 4 - Construction Demolition Debris Landfill Area

Groundwater in the sand and gravel unit at WMA 4 would be routinely monitored at six locations, including four monitoring wells around the Construction and Demolition Debris Landfill, and at two groundwater seep locations along the edge of the north plateau outside of the WVDP fence line.

Groundwater at WMA 4 would be sampled semiannually for radiological indicator parameters (gross alpha, gross beta, and tritium) and for Sr-90.

WMA 6 - Central Project Premises

Groundwater in the sand and gravel unit at WMA 6 would be routinely monitored at two well

locations, including one well upgradient of the rail spur and the other well downgradient of the rail spur and the removed Demineralizer Sludge Ponds and Equalization Basin.

Groundwater at these locations would be sampled semiannually for radiological indicator parameters (gross alpha, gross beta, and tritium).

WMA 7 – NDA

Groundwater in the weathered Lavery till and Kent recessional unit at WMA 7 would be routinely monitored by five wells screened in the weathered Lavery till and three wells screened in the Kent Recessional Sequence. One well cluster would be located upgradient of the NDA and would include a well screened in the weathered Lavery till and one screened in the Kent Recessional Sequence. Two well clusters, each with a well screened in the weathered Lavery till and Kent Recessional Sequence, would be located downgradient of the burial area. The two remaining wells screened in the weathered Lavery till would be located downgradient of the burial area.

Groundwater at WMA 7 would be sampled semiannually for radiological indicator parameters (gross alpha, gross beta, and tritium) and annually for specific radionuclides (Cs-137, Sr-90, Am-241, and Pu isotopes).

Non-Source Area of the North Plateau Plume

Groundwater in the sand and gravel unit would be routinely monitored at 11 well locations within the non-source area of the north plateau groundwater plume. These wells are located along the length of the plume from the WMA 1 barrier wall to the Construction and Demolition Debris Landfill in WMA 4. Three wells are located downgradient of the Permeable Treatment Wall to evaluate its effectiveness in reducing Sr-90 concentrations in groundwater from the sand and gravel unit.

Groundwater in the non-source area of the north plateau groundwater plume would be sampled semiannually for radiological indicator parameters (gross alpha, gross beta, and tritium) and for Sr-90.

2.2.2 Surface Water, Sediment, and Storm Water Monitoring

Surface water and associated stream sediments would be routinely monitored both within and outside the project premises during the Phase 1 institutional control period. The proposed monitoring locations are currently part of the DOE WVDP annual environmental monitoring program. These locations have been uniquely sited to monitor surface water releases from the WVDP and the Center. Several of the locations have been actively monitored since the implementation of the program in 1982 providing a significant historical record of surface waters leaving the WVDP and the Center.

Eight surface water-sampling locations within the project premises would be routinely monitored during the Phase 1 institutional control period (Figure D-5). These locations monitor streams both within (WNDNKEL, WNSP005, WNNDADR, WNFRC67, WNERB53) and leaving the project premises (SNSW74A, WNSWAMP, and WNSP006). Sediment samples would be collected from three locations where surface waters leave the project premises (SNSW74A, WNSWAMP, and WNSP006).

Surface water would be routinely collected and analyzed from three sampling locations

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outside of the project premises (Figure D-6). These locations would monitor surface water quality in Buttermilk Creek and Cattaraugus Creek where these streams leave the Center (WFFELBR, WFBCTCB) and where Buttermilk Creek enters the Center (WFBCBKG). Sediment samples would be collected from all three off-site locations (SFBCSED, SFTCSSED, SFCCSED).

Surface water and sediment samples would be collected from these locations semi-annually and would be analyzed for radiological indicator parameters (gross alpha, gross beta, and tritium).

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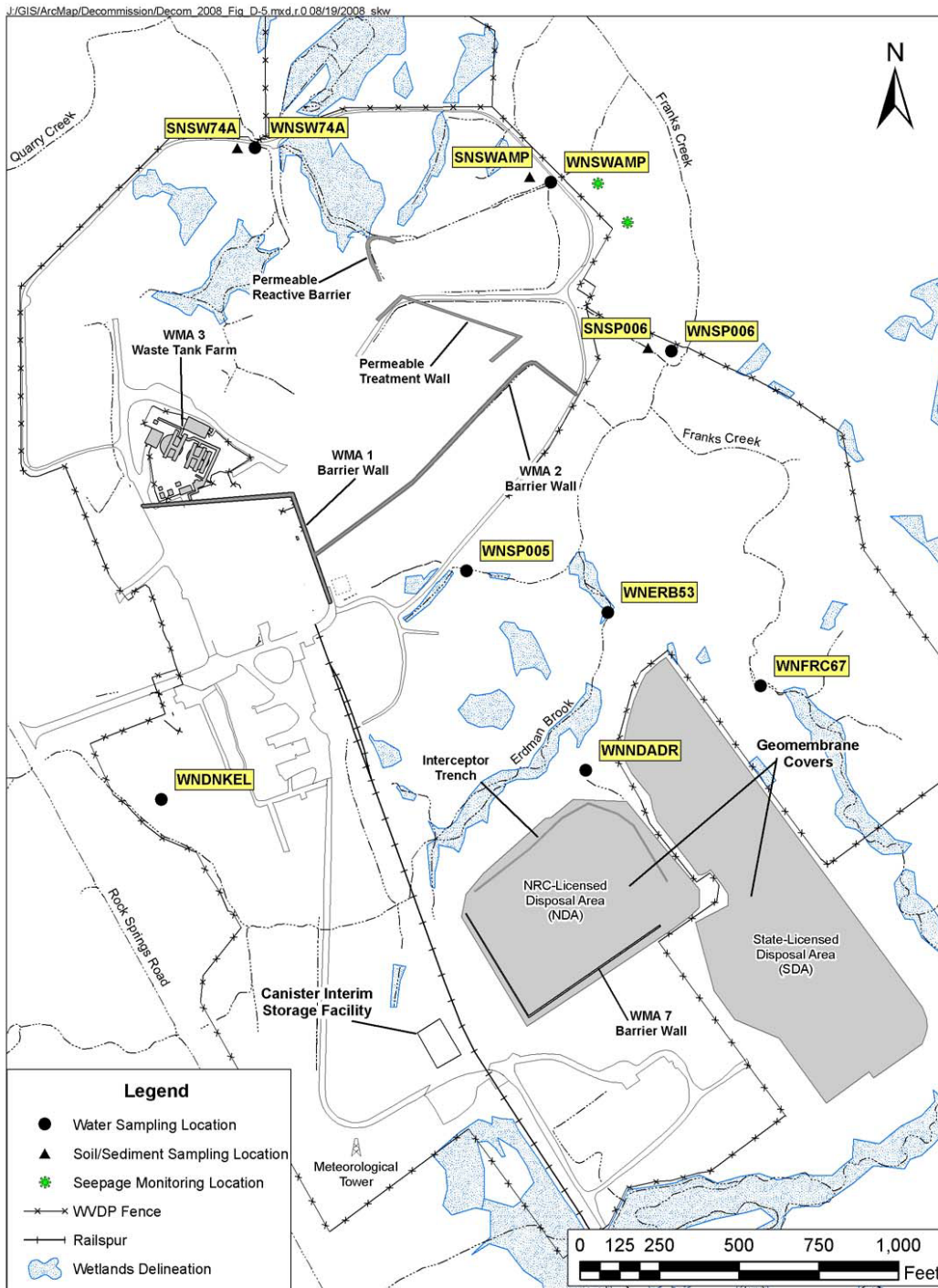


Figure D-5. Surface Water and Sediment Sampling Locations on the Project Premises during the Phase 1 Institutional Control Period

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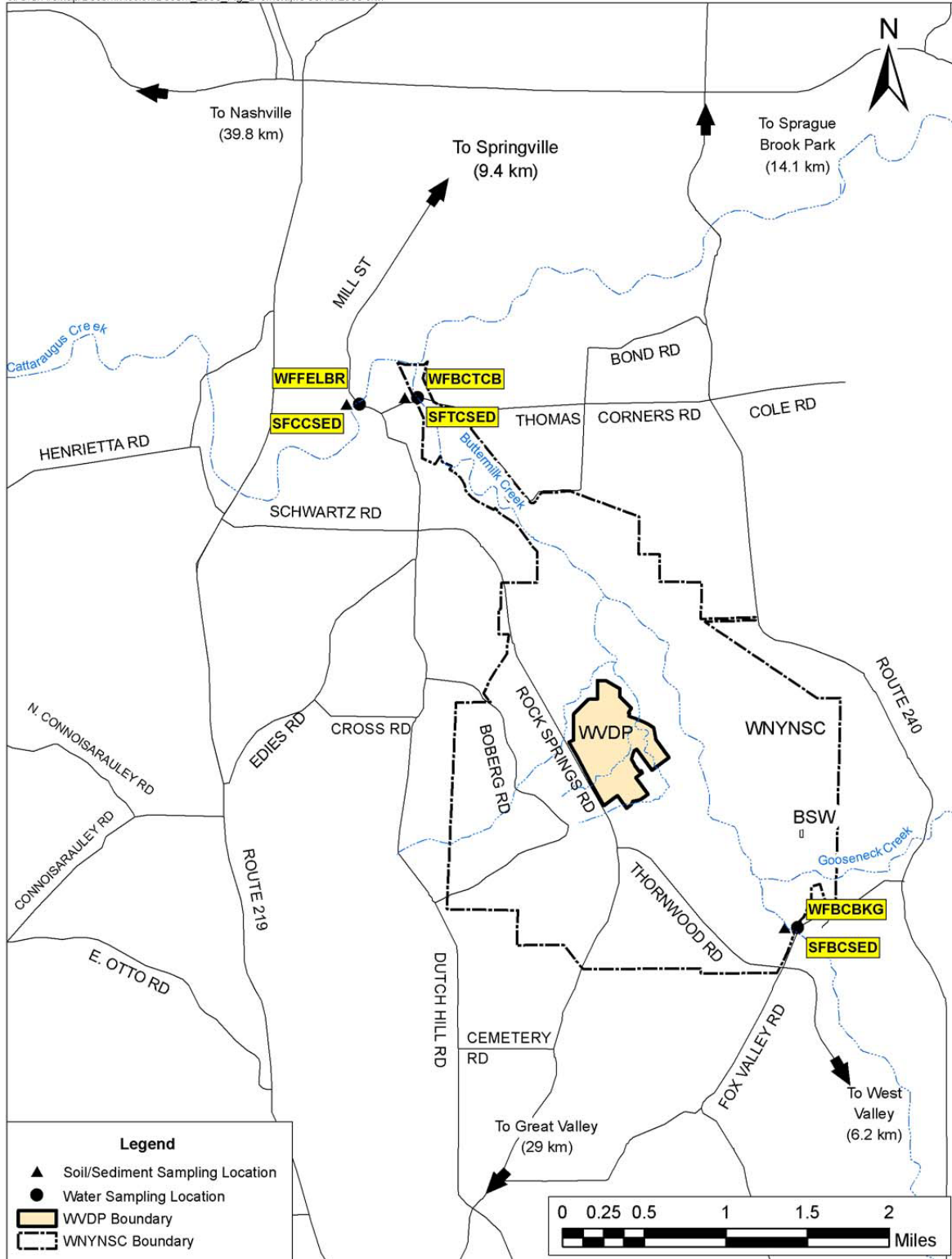


Figure D-6 – Offsite Surface Water and Sediment Sampling Locations during the Phase 1 Institutional Control Period

The New York State Pollutant Discharge Elimination System permit issued to the DOE WVDP requires periodic sampling from storm water outfalls located within the project premises. Sampling from these outfalls during storm events is designed to assess specific chemicals in storm water discharges that may originate from industrial or construction activity runoff from locations within the project premises. The planned storm water sampling locations are identified on Figure D-7. Sampling would be performed semi-annually for the non-radiological parameters specified in the New York State Pollutant Discharge Elimination System permit.

2.2.3 Air Monitoring

The stack discharge from the Permanent Ventilation System Building in the Waste Tank Farm in WMA 3 would be the only air monitoring location to be routinely monitored within and outside of the project premises during the Phase 1 institutional control period (Figure D-8).

The Permanent Ventilation System ventilates the Supernatant Treatment System Valve Aisle and Tanks 8D-1, 8D-2, 8D-3, and 8D-4 in WMA 3. The air discharged from these facilities passes through high-efficiency particulate air filters before discharge through the Permanent Ventilation System Building stack. Air discharged from the Tank and Vault Drying System would also be treated in the Permanent Ventilation System Building.

Air discharges from this location would be analyzed for radiological indicator parameters (gross alpha, gross beta, and tritium) and specific radionuclides (Cs-137, Sr-90, I-129, Am-241, and U and Pu isotopes).

2.2.4 Direct Radiation Monitoring

Direct radiation monitoring using thermoluminescent dosimeters would be performed at 19 locations within and outside of the project premises. These monitoring locations are currently part of the DOE WVDP annual environmental monitoring program and were sited to monitor both on-site and off-site radiation exposure from facilities within the project premises and the State-Licensed Disposal Area. Several of these locations have been actively monitored since 1982.

Eight monitoring locations would be within the project premises (Figure D-9) and eleven stations would be located on the perimeter of the Center (Figure D-10). All locations would be routinely monitored for gamma radiation exposure on a quarterly monitoring schedule.

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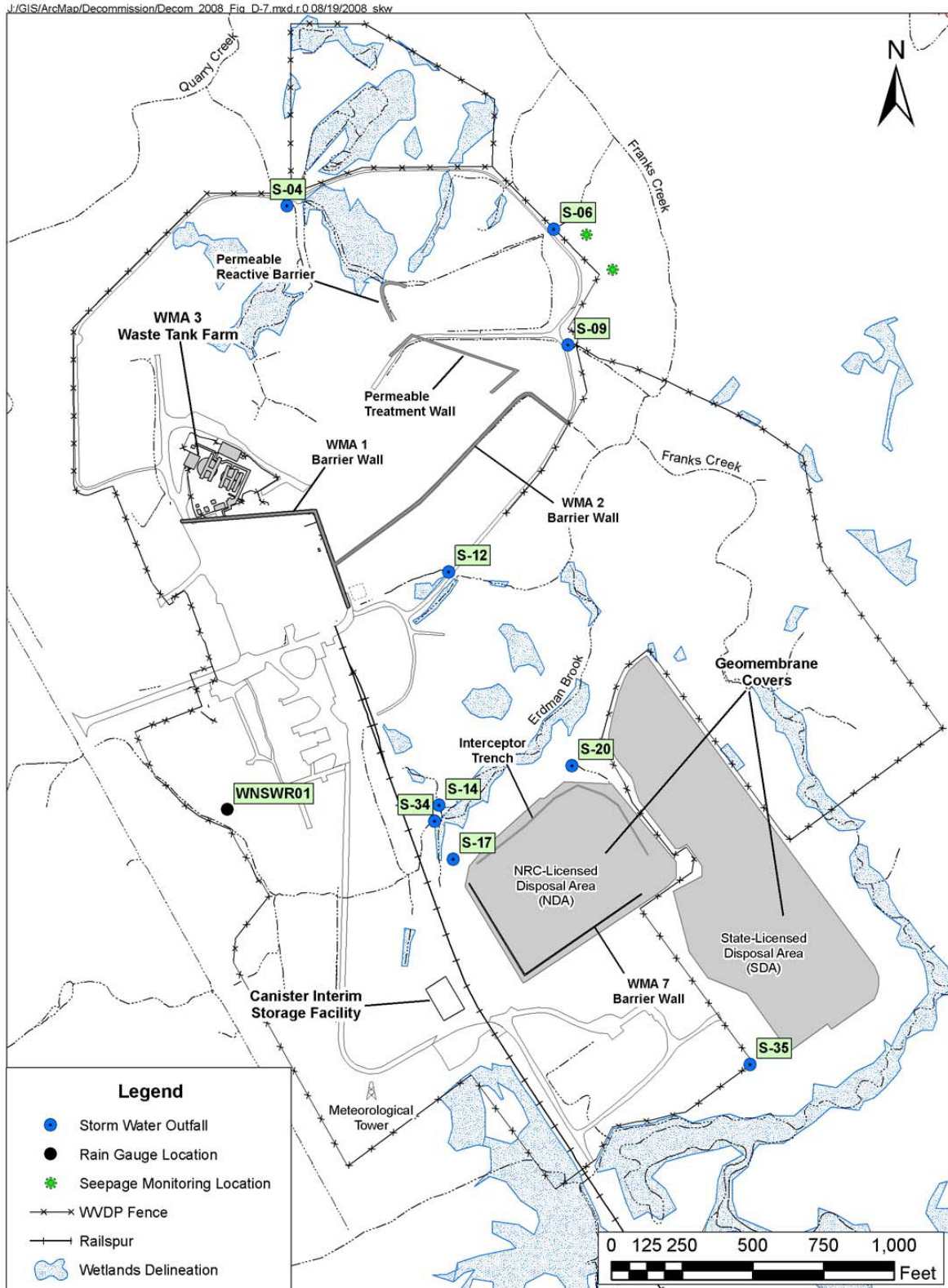


Figure D-7. Storm Water Sampling Locations on the Project Premises during the Phase 1 Institutional Control Period

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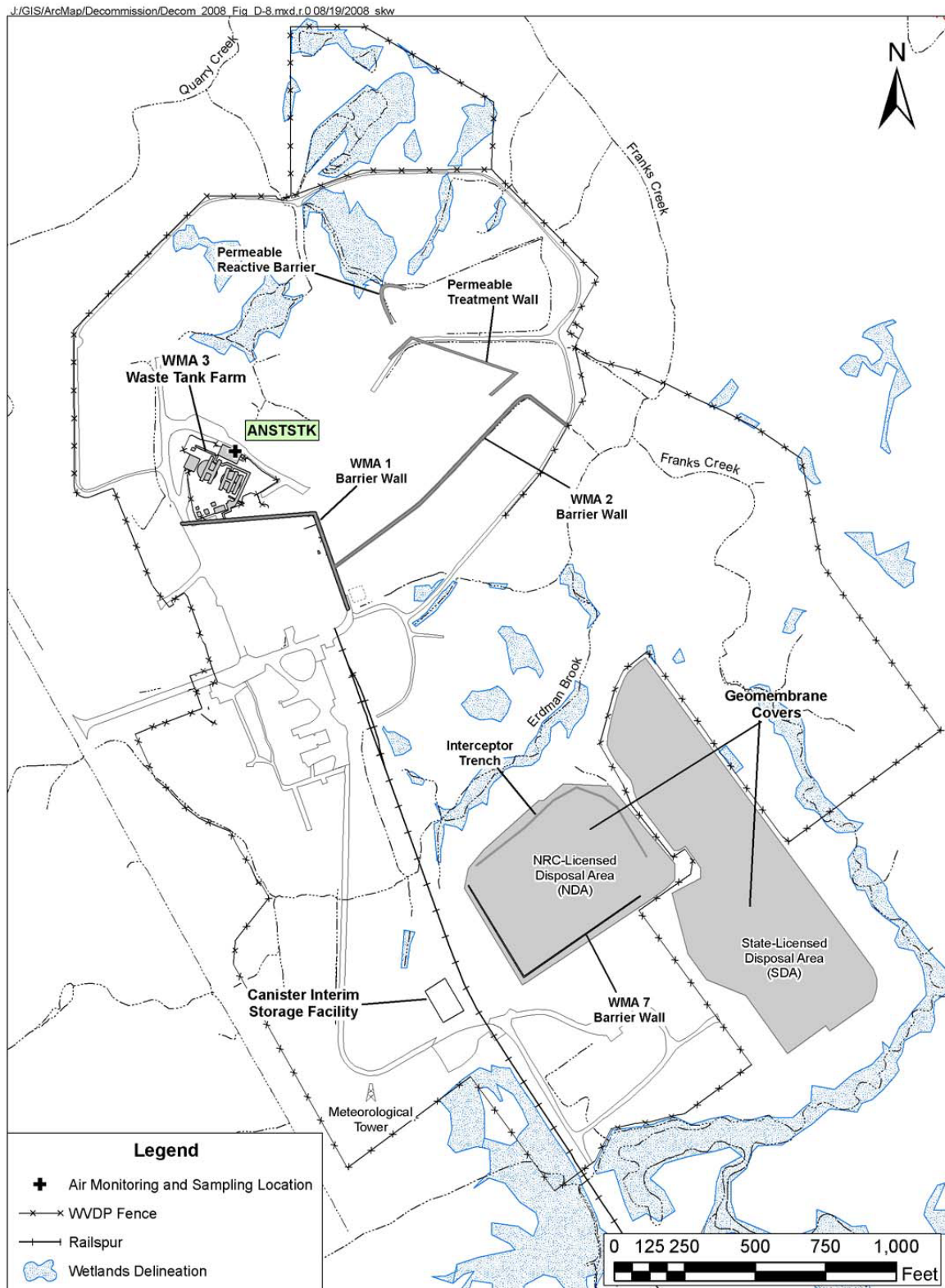


Figure D-8. Air Monitoring Locations on the Project Premises during the Phase 1 Institutional Control Period

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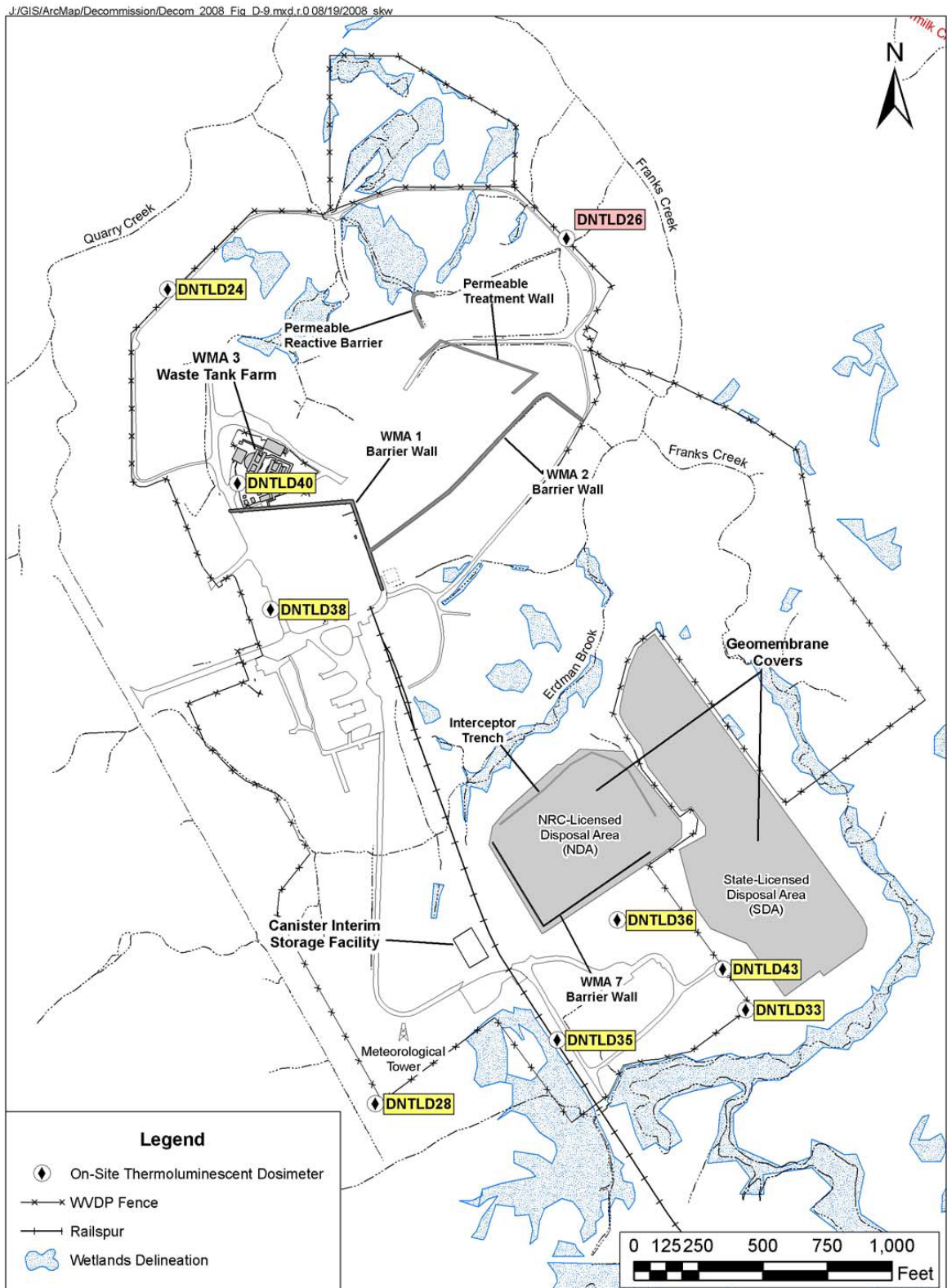


Figure D-9 – Direct Radiation Monitoring Locations on the Project Premises during the Phase 1 Institutional Control Period

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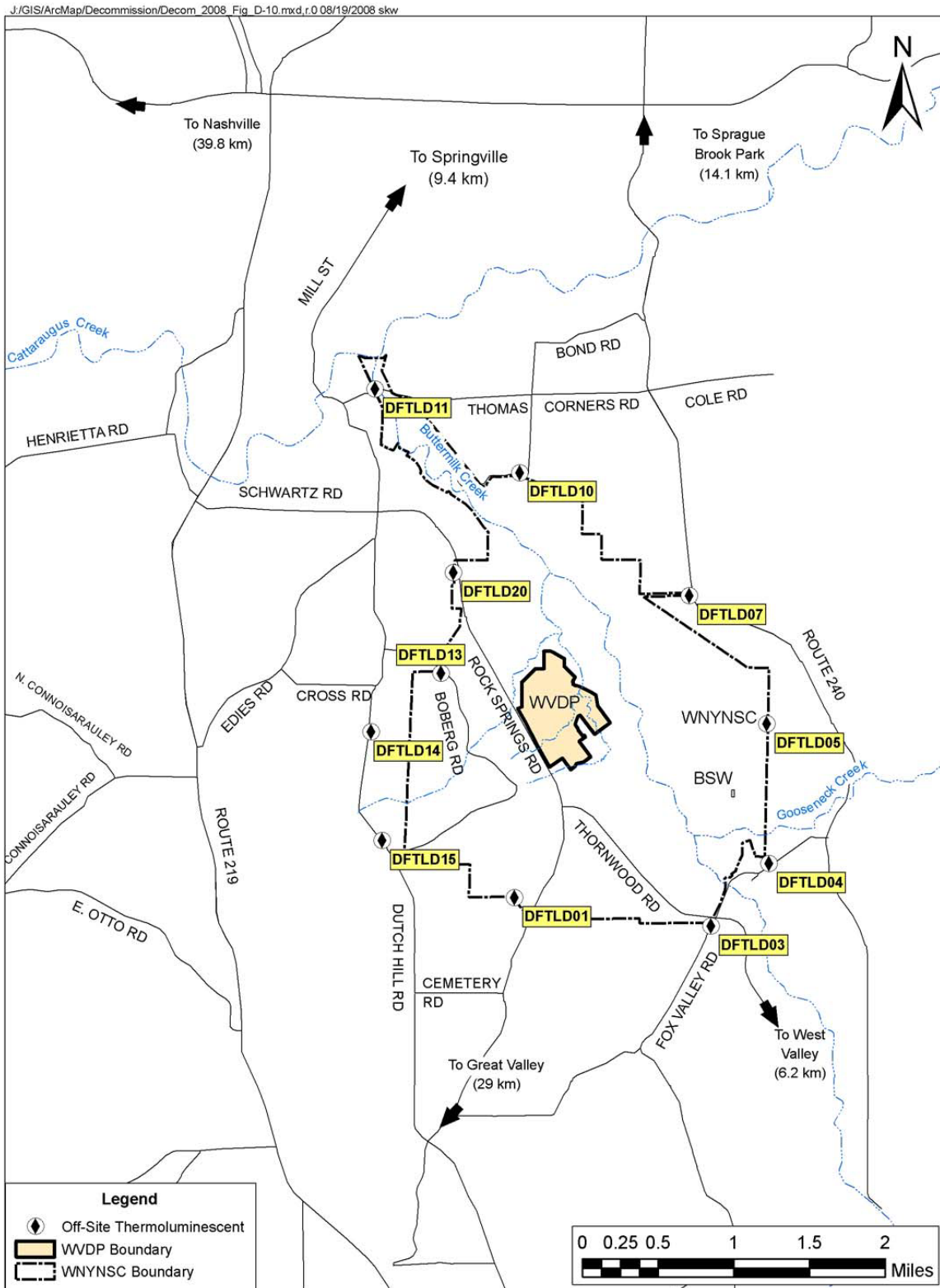


Figure D-10. Offsite Direct Radiation Monitoring Locations during the Phase 1 Institutional Control Period

3.0 Phase 1 Institutional Control Program

This section describes the institutional control program that would be implemented for the project premises following the completion of the Phase 1 remedial activities.

3.1 Government Control of the Project Premises

NYSERDA is the current owner of the project premises property and would remain owner following Phase 1 activities. As stipulated in the Cooperative Agreement with NYSERDA, DOE shall remain in exclusive use and possession of the project premises and project facilities throughout the remainder of the project term (DOE and NYSERDA 1981). DOE would therefore continue control of the project premises during the implementation of the Phase 1 proposed decommissioning activities and during the Phase 1 institutional control period. In this capacity, DOE carries the full authority of the federal government in enforcing institutional controls over the project premises.

DOE would be responsible for operating and maintaining facilities within the project premises such as the Waste Tank Farm, the NDA, and the non-source area of the north plateau groundwater plume in a safe manner. DOE would continue to implement the environmental radiation protection program for the project premises as required by DOE Order 5400.5, *Radiation Protection of the Public and the Environment*. NRC would also be involved in a regulatory oversight capacity over the project premises, which would remain under NRC license.

3.2 Institutional Control Design Features

The institutional control program for the project premises would prevent its unacceptable use and protect against inadvertent intrusion into the site. DOE in its capacity as the steward of the site would ensure that institutional controls are maintained at the project premises during Phase 1 proposed decommissioning and during the Phase 1 institutional control period. These institutional controls would include:

- Security fencing and signage along the perimeter of the project premises to prevent inadvertent intrusion into the site and to notify individuals that access is forbidden without permission from the DOE,
- A full time security force to prevent unauthorized access into the project premises,
- Authorized personnel and vehicle access into the project premises would be limited to designated gateways through the perimeter security fence
- The environmental monitoring program implemented at the project premises during the Phase 1 institutional control period would ensure that operations at the site protect members of the public and the environment from radiation risk.

Additional institutional controls would be provided for the new Canister Interim Storage Facility on the south plateau. These would include measures such as security fencing around the area and appropriate security lighting.

4.0 References

Code of Federal Regulations and Federal Register Notices

10 CFR 20 Subpart E, *Radiological Criteria for License Termination*.

67 FR 22, *Decommissioning Criteria for the West valley Demonstration Project (M-32) at the West Valley Site; Final Policy Statement*, U.S. Nuclear Regulatory Commission, Washington, D.C., February 1, 2002.

DOE Orders

DOE Order 5400.5, Change 2, *Radiation Protection of the Public and the Environment*. U.S. Department of Energy, Washington, D.C., January 7, 1993.

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